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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JAVIER CABRERA, an individual;
DEBORAH MILLER, an individual,
CHERIE MANCINI, an individual,
NEVADA SERVICE EMPLOYEES UNION
STAFF UNION ("NSEUSU"),
an unincorporated association,

Plaintiffs,

vs.

SERVICE EMPLOYEES INTERNATIONAL
UNION, a nonprofit cooperative corporation;
LUISA BLUE, in her official capacity as
Trustee of Local 1107; MARTIN MANTECA,
in his official capacity as Deputy Trustee of
Local 1107; MARY K. HENRY, in her official
capacity as Union President; CLARK COUNTY
PUBLIC EMPLOYEES ASSOCIATION dba
NEVADA SERVICE EMPLOYEES UNION
aka SEIU 1107, a non-profit cooperative
corporation; DOES 1-20; and ROE
CORPORATIONS 1-20, inclusive,

Defendants.

Case No.: 2:18-cv-00304-RFB-DJA

**STIPULATION AND ORDER
REGARDING AVAILABILITY OF
PARTIES FOR TRIAL; AND
WITHDRAWAL OF PLAINTIFFS'
MOTION IN LIMINE**

(First Request)

[Local Rule IA 6-1]

STIPULATION AND ORDER

Whereas, on May 14, 2020, the parties submitted a joint pretrial order indicating an expected 10-day trial and trial availability on October 25-29, 2021 and thereafter [ECF No. 240];

Whereas, on August 31, 2021, the parties held a settlement conference before Magistrate Judge Daniel J. Albregts, but were not able to settle the case [ECF No. 245]; and

Whereas, the previously-indicated dates are no longer feasible for trial, given the imminent deadlines that would be in effect if trial were to proceed on those dates, the pendency of several motions bearing on the scope of trial, and concerns about interstate travel of attorneys and out-of-state witnesses in light of the continued seriousness of the COVID-19 pandemic;

The parties hereby stipulate as follows: (a) the parties have met and conferred and are available for trial on April 18-22, 2022 and April 25-29, 2022, and request the Court issue a trial order setting those dates for trial, or other mutually agreeable dates; and (b) Plaintiffs hereby withdraw the motion in limine filed on September 15, 2022 (ECF Nos. 247 & 248, "Motion in Limine to Exclude Defendant's Untimely Vocational Rehabilitation Expert Testimony and Limit Expert Testimony to Rebuttal") until a later time after the Court issues its trial order.

DATED: September 21, 2021.

CHRISTENSEN JAMES & MARTIN

ROTHNER, SEGALL & GREENSTONE

By /s/ Evan James

By: /s/ Eli Naduris-Weissman

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IT IS SO ORDERED:

Dated: _____

UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I am a member of Rothner, Segall & Greenstone. On this 22nd day of September, 2021, I caused a true and correct copy of the foregoing **STIPULATION AND ORDER REGARDING AVAILABILITY OF PARTIES FOR TRIAL; AND WITHDRAWAL OF PLAINTIFFS' MOTION IN LIMINE (First Request)** to be served in the following manner:

✓ ELECTRONIC SERVICE: Pursuant to [LR IC 4-1](#) of the United States District Court for the District of Nevada, the above-referenced document was electronically filed and served through the Notice of Electronic Filing automatically generated by the Court.

ROTHNER, SEGALL & GREENSTONE

By /s/Eli Naduris-Weissman
ELI NADURIS-WEISSMAN